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**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 6, 2020

**VIA EMAIL**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Nicholas Truglia, 19 Cr. 921 (AKH)*

Dear Judge Hellerstein:

The Government writes on behalf of the parties to respectfully request that the Court adjourn the conference in this case currently scheduled for October 7, 2020, for approximately 60 days. The Government has produced a substantial amount of discovery materials and is in the process of preparing additional discovery. The adjournment requested herein will allow the Government time to produce and the defendant time to receive and review these materials.

If the Court grants this request, the Government further requests that the Court exclude time under the Speedy Trial Act between October 7, 2020, and the conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted in order to allow additional time for the Government to produce and the defendant to receive and review discovery, additional time that is particularly warranted in light of the ongoing COVID-19 pandemic. An exclusion is also warranted to allow the parties additional time to engage in discussions of a potential pretrial resolution of this case. The defendant consents to this request.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: Timothy Capozzi  
Timothy Capozzi  
Assistant United States Attorney  
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*The conf is adjourned until  
Dec. 9, 2020 at 11:00 a.m.; Time  
is excluded until then; in the  
interest of justice.*  
X Alvin K. Hellerstein  
10/6/2020 cc: Mark Gombiner, Esq., Federal Defenders of New York